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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

IN THE MATTER OF THE SEIZURE OF:

No. CV 18-06742-RGK (MAAx)

ANY AND ALL FUNDS HELD IN
REPUBLIC BANK OF ARIZONA
ACCOUNTS XXXX1889; XXXX2592,
XXXX1938, XXXX2912, AND
XXXX2500.

**STIPULATION AND REQUEST TO
CONTINUE DEADLINE AND HEARING ON
MOTION TO VACATE OR MODIFY SEIZURE
WARRANTS**

CURRENT DEADLINE AND HEARING
Hearing: 9/10/2018
Hearing Time: 9:00 A.M.

PROPOSED
Opposition Deadline: 8/27/2018
Hearing Deadline: 9/17/2018
Location: Courtroom of the
Hon. R. Gary
Klausner

On August 1, 2018, though his attorney of record, Thomas H. Bienert, Jr., defendant James Larkin (*United States v. Michael Lacey, et al.* CR 18-422-PHX-SPL), filed a Notice of Motion and Motion to

1 Vacate or Modify Seizure Warrants, which motion was joined by
2 defendants Lacy, Brunst, and Spear. The matter was scheduled for
3 hearing on August 29, 2018, before the Honorable Patrick J. Walsh,
4 United States Magistrate Judge for the Central District of
5 California. On August 7, 2018, the matter was reassigned to the
6 Honorable R. Gary Klausner, United States District Judge for the
7 Central District of California. Thereafter, the Court vacated all
8 dates set by the Magistrate Judge and set a hearing date for
9 September 10, 2018.

10 Government counsel will be out of town on the current hearing
11 date of September 10, 2018, and seeks to continue the hearing one
12 week, until September 17, 2018. Defendants do not oppose a brief
13 continuance of the hearing to September 17, 2018. The parties
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1 further agree that any government opposition to the motion to vacate
2 or modify seizure warrants is due no later than August 27, 2018.

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4 Dated: August 23, 2018

Respectfully submitted,

5 NICOLA T. HANNA
6 United States Attorney

7 LAWRENCE S. MIDDLETON
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9 Chief, Criminal Division
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11 Assistant United States Attorney
12 Chief, Asset Forfeiture Section

13 /s/John Kucera
14 JOHN J. KUCERA
15 Assistant United States Attorney

16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA

18
19 Dated: August 23, 2018

/s/(per e-mail confirmation)
20 Thomas H. Bienert
21 Kenneth M. Miller
22 Anthony R. Bisconti
23 BIENERT, MILLER & KATZMAN, PLC

24 Attorneys for Movant
25 JAMES LARKIN
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